

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X	
ARTISAN MANUFACTURING	:
CORPORATION,	:
	:
	:
Plaintiff,	:
	:
	:
v.	:
	:
ALL GRANITE & MARBLE	:
CORPORATION,	:
	:
	:
Defendant.	:
-----X	

07-cv-11278 (WHP)

DECLARATION OF SEBASTIAN SROKA IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

I, Sebastian Sroka, do hereby state as follows:

1. I am a graphic designer, specializing in the design of advertising, including print advertising and internet web design.
2. From the years 2006 to 2007, I was employed by All Granite & Marble Corporation as a graphic designer. In this role, I was assigned various design tasks, including development of All Granite & Marble's internet web-page, designing various print advertisements, and developing logos for various products.
3. In late 2006 or early 2007, I was assigned the task of developing new logos for various sink products. In particular, I was to develop logos for stainless steel sinks and for ceramic sinks.
4. The All Granite & Marble ceramic sinks were referred to as the "Di Monte" brand of sinks, and were regarded as more premium, higher-class sinks. The stainless steel All Granite & Marble sinks were not given a brand name. I was tasked with developing a logo for both of these sinks.

5. I was advised that All Granite & Marble wished to develop a logo for the stainless steel sinks that depict All Granite & Marble's strong stature, and that would be geared toward its prospective customers. Since All Granite & Marble is a Polish-based business, taking great pride in its Polish heritage and tradition, I was instructed to find a logo connected with Polish tradition.
6. In researching Polish history, I looked to the past Kings of Poland for inspiration. In particular, I began to look at the various crowns that were worn by such Kings. The crown is a symbol of regal stature, which I felt would provide a great symbol for All Granite & Marble's strong heritage.
7. I looked at pictures and portraits of King Boleslaw I (The Brave) of Poland, and decided that the crown of King Boleslaw I should be the basis for the All Granite & Marble logo.
8. In developing the All Granite & Marble crown logo, I essentially copied King Boleslaw I's crown. The All Granite & Marble crown logo I created is King Boleslaw I's three-pronged crown, including jewels on its base, and further incorporating fancy swirled designs emanating from the base of the crown.
9. I created the logo for the "Di Monte" brand, which includes the words "DI MONTE" in fancy styled writing enclosed in an oval shape. I developed this logo during the same period that I developed the crown logo.
10. I have since been made aware of Artisan's "fleur-de-lis" logo. I do not believe that I was aware of this logo at the time I created the crown logo, and I do not believe that the crown logo that I created is similar in any way to the Artisan "fleur-de-lis" logo.

I swear that the foregoing is true and accurate under penalty of perjury.

Dated: February 20, 2008

s/ Sebastian Sroka  
Sebastian Sroka